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2      Presented to the Court by the foreman of the  
3      Grand Jury in open Court, in the presence of  
4      the Grand Jury and FILED in The U.S.  
5      DISTRICT COURT at Seattle, Washington.

6  
7      SEPTEMBER 10 2003  
8      By Bruce Riffkin, Clerk  
9      Deputy

10      UNITED STATES DISTRICT COURT  
11      WESTERN DISTRICT OF WASHINGTON  
12      AT SEATTLE

13      UNITED STATES OF AMERICA,

14      Plaintiff,

15      v.

16      JEFFREY LEE PARSON,

17      Defendant.

18      CR03 0379 P

19      INDICTMENT



20      03-CR-00379-INDI

21      THE GRAND JURY CHARGES THAT:

22      COUNT ONE

23      **(Intentionally Causing and Attempting to Cause Damage to a Protected Computer)**

24      Beginning in or about August 2003, and continuing until the present, within the Western  
25      District of Washington, and elsewhere, JEFFREY LEE PARSON knowingly caused and  
26      attempted to cause the transmission of a program, information, code, and command, that is, an  
27      Internet worm and packets of data sent in the form of a distributed denial of service attack, and as  
28      a result of that conduct, intentionally caused and attempted to cause damage, without  
29      authorization, to protected computers, that is, computers of Microsoft Corporation and other  
30      computers throughout the world that were used in interstate or foreign commerce or  
31      communication, causing an aggregate loss to Microsoft Corporation and other persons of at least  
32      \$5,000 in value during a one-year period.

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34      //

1 All in violation of Title 18, United States Code, Sections 1030(a)(5)(A)(i),  
2 1030(a)(5)(B)(i), 1030(b), and 1030(c)(4)(A), and Section 2.  
3  
4

A TRUE BILL  
5 DATED: 9/10/2003

6 JT Mar  
7 FOREPERSON

8   
9 JOHN MCKAY  
10 *for*

11 United States Attorney

12   
13 FLOYD G. SHORT

14 Assistant United States Attorney

15   
16 ANNETTE L. HAYES

17 Assistant United States Attorney